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**REMOVAL ACTION NO. 15 SCRAP METAL PILES, PHASE IIB  
SCRAP COPPER, WORK PLAN MILESTONES**

07/27/94

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LETTER



**Department of Energy**  
**Fernald Environmental Management Project**  
P. O. Box 398705  
Cincinnati, Ohio 45239-8705  
(513) 648-3155

JUL 27 1994  
DOE-2012-94

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Mr. James Saric, Remedial Project Manager  
U.S. Environmental Protection Agency  
Region V - 5HRE-8J  
77 W. Jackson Blvd  
Chicago, IL 50604-3590

Mr. Tom Schneider, Project Manager  
Ohio Environmental Protection Agency  
401 East Fifth Street  
Dayton, Ohio 45402-2911

R-026-208. 4

Dear Mr. Saric and Mr. Schneider:

**REMOVAL ACTION NO. 15 SCRAP METAL PILES, PHASE IIB SCRAP COPPER, WORK PLAN MILESTONES**

The Removal Action No. 15, Scrap Metal Piles, Phase IIB Scrap Copper, Work Plan indicates that the interim milestone for submission of the Removal Action Project Plan (RAPP) was September 30, 1993 and the milestone for submission of the Final Report is March 31, 1995. The work plan stated that, "Due to the fact that this removal action involves on-going procurement via Requests For Proposals (RFPs), with proposals currently in review, schedules are proprietary at this time and cannot be finalized until the contract for beneficial reuse is awarded."

Submission of the Subcontractor's RAPP and the Final Report has been delayed due to the following:

A need to provide to the bidders more radiological characteristic data on the copper as identified at the prebid conference.

Fernald Environmental Management Project (FEMP) needed to address specific contract language concerns of the vendor's proposal.

A technical evaluation of the vendor's proposed method of beneficial reuse revealed that the vendor does not have a proven method for free release of the scrap copper in place.

The preaward survey of the vendor's facility revealed that a number of regulatory issues need to be reviewed and evaluated.

The vendor's schedule indicated that processing of the copper would be completed 60 weeks after approval of the RAPP. This would delay submission of the final report.

The RFP was issued in anticipation of FEMP obtaining approval of the application to the Nevada Test Site (NTS) for disposal of asbestos. FEMP's approval is contingent upon NTS receiving a State of Nevada Permit. NTS recently indicated that FEMP's application is on hold for six (6) months.

The potential threat from the scrap copper pile was mitigated by containerization of the material by FEMP work forces and a tarp has been placed over each container for added protection, as an interim step. Containerization was completed by March 30, 1993.

The schedule for beneficial reuse of the scrap copper will be finalized as soon as the following issues are addressed:

A revised proposal from the vendor is being requested which will include the beneficial reuse options listed below:

Provide the cost and schedule to shred the one hundred and three (103) sealands of copper wiring and survey for unrestricted reuse.

Provide the cost and schedule for metal melt of the one hundred and three (103) sealands of copper wiring for restricted reuse.

Provide the cost and schedule for survey for unrestricted reuse of the twenty six (26) white metal boxes of shredded copper.

Provide the cost and schedule for metal melt for restricted reuse of the twenty six (26) white metal boxes of shredded copper.

Provide the cost and schedule for metal melt of the nineteen (19) white metal boxes of copper ingots for restricted reuse.

The vendor will be required to perform pilot testing by using at least two boxes of shredded copper and two sealands of copper wiring to demonstrate that the materials can successfully be free released.

The vendor is addressing preaward survey issues. FEMP will perform a surveillance prior to award of the contract.

FEMP is reviewing the Waste Acceptance Criteria for disposal of asbestos at Envirocare in lieu of disposal at NTS.

An extension will be requested for submission of the RAPP and the Final Report upon receipt and evaluation of the revised proposal from the vendor.

If you or your staff have any questions or comments regarding this matter, please direct them to Anand Shah at (513) 648-3146.

Sincerely,

*Johnny Rensing*

*for*

Jack R. Craig  
Fernald Remedial Action  
Project Manager

FN:Shah

cc:

- K. A. Chaney, EM-423, Q0
- D. R. Kozlowski, EM-423, Q0
- G. Jablonowski, USEPA-V, AT-18J
- J. Kwasniewski, OEPA-Columbus
- P. Harris, OEPA-Dayton
- G. Mitchell, OEPA-Dayton
- M. Proffitt, OEPA-Dayton
- R. Owen, ODOH
- J. Michaels, PRC
- L. August, GeoTrans
- F. Bell, ATSDR
- ~~AR Coordinator, FERMCO~~